

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) CIVIL CASE NO. 2:19-cv-767-ECM  
                        )  
DYNAMIC SECURITY, INC. )  
                        )  
Defendants.         )

**NOTICE OF APPEAL**

Notice is hereby given that Dynamic Security, Inc., Defendant in the above named case, hereby appeals to the United States Court of Appeals for the Eleventh Circuit from: (a) the final Order and Judgment entered in this action on the March 30, 2023, (Doc. 186); (b) the Memorandum Opinion and Order entered by the Court on March 11, 2024, denying Defendant's Motion for Renewed Judgment as a Matter of Law as to Liability and Punitive Damages; to Vacate, Alter or Amend the Judgment; or Alternatively, for a New Trial or Remittitur of Emotional Distress and Punitive Damages. (Doc. 212); (c) Order entered by the Court on February 21, 2023, denying Defendant's Motion to Strike Plaintiff's Jury Demand (Doc. 147); (d) the Oral Orders entered March 28, 2023, and March 29, 2023, denying Defendant's Motion for Judgment as a Matter of Law [no Doc. number]; (e) Oral Order entered March 28, 2023, denying Defendant's First Motion in Limine to exclude Plaintiff's

Testimony About Gloria Robinson's Alleged Comments about the Content of Memos Sent by "The Koreans" [no Doc. number]; (f) Oral Order entered March 28, 2023, denying Defendant's proposed jury instructions (Doc. 161), in particular the "Catastrophe Management" instructions, the instruction that Plaintiff has to complain of race discrimination to amount to protected activity, and the instruction that the decision-maker must have knowledge of the protected activity [no Doc. number]; (g) denial of Defendant's Jury Verdict Form (Doc. 181) as reflected in Jury Verdict Form submitted to jury on March 30, 2023 (Doc. 185); (h) Closing Jury Instructions to jury as entered by the Court on March 30, 2023 (Doc. 184); and (i) the Memorandum Opinion and Order entered by the Court on March 14, 2024, granting Plaintiff's Motion for Equitable Relief of Reinstatement and Interest as to prejudgment interest (Doc. 213).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on 5<sup>th</sup> day of April, 2024, he electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

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